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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
FRONTIER COMMUNICATIONS)	Case No. 20-22476 (MG)
CORPORATION <i>et al.</i> ,)	Hon. Martin Glenn, Chief Judge
Reorganized Debtors.)	(Jointly Administered)
)	

**DECLARATION OF TIMOTHY R. SHANNON IN SUPPORT OF
REORGANIZED DEBTORS' RESPONSE TO INTELLECTUAL VENTURES'
EMERGENCY MOTION (ECF Nos. 2101 & 2102) REGARDING REDACTION**

1. I am counsel of record for the Reorganized Debtors (“Frontier”). I make this declaration in support of Frontier’s Response to Intellectual Venture’s Emergency Motion (ECF Nos. 2101 & 2102) Regarding Redaction, filed herewith.

2. I am a partner at Duane Morris LLP, with an office located at 100 High Street, Suite 2400, Boston, MA 02110. I am over the age of eighteen, with personal knowledge of the facts asserted in this declaration.

3. I participated in the May 11, 2022, status conference before the Court. Two days later, on May 13, counsel for the parties conferred regarding a variety of trial-related matters, including redactions. IV’s lawyer, Attorney Plies, briefly indicated IV was planning to pare back

its redactions and redact only top-level numbers, but indicated IV was still working out the details. I responded that the redactions in Frontier's brief had been primarily for IV's benefit and that particularily in light of the Court's admonition, Frontier likely had none of its own.

4. We did not hear from IV again on the topic of redactions until June 1, 2022, concerning IV's proposed Emergency Motion.

5. My office received the ECF notice of the Court's Order dated May 19, 2022 (ECF 2097).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 6, 2022

/s/ *Timothy Shannon*

Timothy R. Shannon, Esq.
100 High Street, Suite 2400
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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2022, I caused a true and accurate copy of the foregoing document to be served on the counsel for Intellectual Ventures II LLC by filing the foregoing via the Court's ECF system.

/s/ Timothy R. Shannon

Timothy R. Shannon